



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

EPA Region 5 Records Ctr.



258609

NOV 27 1992

REPLY TO THE ATTENTION OF:

HSRL-6J

Jude Hobza
U.S. Army Corps of
Engineers - CEMRO-ED-ER
215 N. 17th St.
Omaha, NE 68102

Dear Mr. Hobza:

U.S. EPA and Illinois EPA have reviewed the Draft Work Plan for the removal of hard rubber battery case material and have the following comments:

General

1. Devote a portion of the main text to the subject of dust control, which is mentioned only in Sections 5 and 9 of Appendix B. It is essential that 1) unless it is already very wet, the area to be excavated is pre-wetted to prevent visible emissions (VES) and 2) if VES are observed in the work area, work is stopped immediately.
2. Brett Hanke (618-452-6218), Granite City Engineer; Tyrone Echols (618-877-2412), Mayor of Venice; and Eddie Salmon (618-451-6971), of Eagle Park Acres should all be contacted prior to excavation for coordination and information regarding city ordinances, load limits, etc.
3. Do not use the term "Sites" to describe the areas to be cleaned up. Replace "sites" with the term "areas" or "locations" throughout the document, including the title page. The attached pages indicate some places in the document where the word "sites" is used.

Specific

1. Page 1-1, fourth line - replace "soil" with "hard rubber battery case material". Carry this through to appendices A and B.
2. Page 1-1, fifth line - insert "Madison, and Venice" after "Granite City". Carry this through to appendices A and B.
3. Page 1-1, Section 1.1, first line - insert "includes a former secondary lead smelting operation located at the NL/Taracorp plant, a former secondary lead smelting operation located at 16th Street and Cleveland Boulevard in Granite City" after "Site" and delete the remainder of this sentence. Carry this through to Appendices A and B.
4. Page 1-1, Section 1.1, second line - replace "facilities at the site" with "plant".
5. Page 1-2, Section 1.2, fourth line - insert "and visibly clean for driveways, alleys, etc" after "ppm".
6. Page 1-2, Section 1.3, Second Paragraph, last line - add in pesticides to the list of backfill analytes.
7. Page 1-2, Section 1.3, Third Paragraph, second line - insert "driveways, etc" between "alleyways" and "and".
8. Page 2-3, Section 2.4, second line - replace "within the NL Site." with "at the Taracorp plant."
9. Page 2-4, Section 2.5, Fifth Paragraph, first line - collect additional backfill samples anytime the soil composition/appearance changes noticeably.
10. Page 2-5, Table 2.1 - add a footnote at the bottom of the table that states "For purposes of this action, the term 'hazardous' denotes materials that exceeded the standard for lead under the TCLP test."
11. Page 3-6, Section 3.3.1, Third Paragraph and Section 3.3.2.1 - This would be a good spot to discuss dust control measures, which will also be required for any clearing and grubbing activities performed in contaminated areas.

12. Page 3-6, Section 3.3.1, Second Paragraph - replace "NL Industries/Taracorp Site" with "Taracorp Plant".
13. Page 3-7, fifth line - concrete may be used in lieu of asphalt, and all of this will be subject to the requests of the residents. Insert language to this effect in the sentence that ends on this line.
14. Page 3-7, Sand Road bullet - do not change anything here, but realize that this area may be excluded from the rapid response action.
15. Appendix A, Page 3-1, Section 3.2 - verification sampling must be done in all "residential" areas. XRF screening cannot be used as a substitute.
16. Page 3-6 (Appendix A), Section 3.6, Second Paragraph - this statement is acceptable only if it is intended to be a definition of the holding time for metals.
17. Appendix A, Page 5-1, Section 5.2 - the approximate depth of sampling should be specified.
18. Appendix B, Page 9-1, Section 9.1, Second Paragraph - unless already wet, excavation areas must be pre-wetted to prevent visual dust or emissions.
19. Appendix B, Page 9-2, Section 9.6 - replace the language in the first two sentences to read: "In order to maintain environmental air quality, excavation areas will be pre-wetted to prevent visible emissions of fugitive dust. If visible emissions are observed in the work area, work will be shut down and further dust suppression techniques (i.e. wetting) will be employed until no visible emissions are observed."
20. Appendix B, Page 9-3, Table 9.1, "Action Level" column, "Visual" row - replace "excavation perimeter" with "work area".

The comments of Illinois EPA are attached. All of these comments must be addressed with the exceptions of Work Plan Comments #7 and #9. Comment #7 can be ignored completely and comment #9 need not be addressed, although the subject

of decon water being used for dust suppression should be discussed further among the parties involved at a future date. Additionally, the CSAP comments are debatable.

In closing, to avoid further confusion regarding the subjects of "500 ppm cleanup" versus "visual cleanup" and Confirmation Sampling, to which many of the comments apply, the following explanation is provided:

- Venice alleys will be excavated using visual criteria.
- Areas that are not presently a parking lot, driveway, garage foundation, or similar use will be excavated to the 500 ppm lead cleanup level.
- Areas that are presently a parking lot, driveway, garage foundation, or similar use will be excavated using visual criteria if restoration of the area involves a barrier (asphalt, concrete, etc), or to the 500 ppm cleanup level if restoration of the area does not involve such a barrier. No final determination can be made until the resident is consulted regarding restoration.
- Confirmation sampling must be done in all excavations that do not use visual criteria so that confirmation can be made that the 500 ppm cleanup level has been achieved.
- Five samples (total) must be taken in areas excavated using visual criteria.
- Extremely quick turnaround time must be used for analysis of all confirmatory samples.

Please contact me at (312) 886-4742 if you have any questions concerning this comment letter or the attachments.

Sincerely yours,

Brad Bradley

Brad Bradley
Remedial Project Manager
Attachments
CC: Brian Kulnar, IEPA
w/o attachments